

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CLINT ENGELBRETSON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

BAGELCODE USA, INC., a Washington  
corporation; GOOGLE LLC, a Delaware  
limited liability company; and GOOGLE  
PAYMENT CORP., a Delaware corporation,

Defendant.

No. 2:21-cv-00296-JLR

**STIPULATION AND ~~PROPOSED~~  
ORDER TO STRIKE OR EXTEND  
PRETRIAL DEADLINES**

**NOTE ON MOTION CALENDAR:  
APRIL 16, 2021**

**STIPULATION**

Pursuant to previous stipulations among the parties and orders of this Court, Defendants will be responding to Plaintiff's Complaint on or before May 24, 2021. Dkt. Nos. 11, 17. On April 5, 2021, the Court entered two scheduling orders setting various other initial deadlines, the first of which is set for April 19, 2021. Dkt. Nos. 30-31. The parties expect Defendants will file motions responsive to Plaintiff's Complaint on or before May 24, 2021. To preserve the resources of the parties and the Court, the parties wish to strike the deadlines set by the Court in Docket Nos. 30-31 and reset them after the Court has ruled on Defendants' expected motions.

*Stipulation and ~~Proposed~~ Order to Strike or Extend Pretrial  
Deadlines: No 2:21-cv-00296 - 1*

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Accordingly, the parties stipulate and agree as follows:

All deadlines set in Docket Nos. 30-31 are stricken. The Court will reset those deadlines after the Court rules on all motions filed in response to Plaintiff's Complaint on or before May 24, 2021.

Alternatively, if the Court prefers to reset the deadlines now, the parties agree that the Court should set new deadlines as follows:

Deadline for FRCP 26(f) conference: 7/23/21

Initial Disclosures Pursuant to FRCP 26(a)(1): 8/6/21

Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): 8/13/21

Deadline to complete discovery on class certification (not to be construed as a bifurcation of discovery): 11/8/21

Deadline for Plaintiffs to file motion for class certification (noted on the fourth Friday after filing and service of the motion pursuant to Local Rules W.D. Wash. LCR 7(d)(3) unless the parties agree to different times for filing the response and reply memoranda): 12/8/21

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1 Striking or extending these deadlines is done for good cause. Fed. R. Civ. P. 16(b)(4).  
2 The extensions will conserve the resources of the parties and the Court, and enable this action  
3 to proceed in the manner most efficient for the parties and the Court.  
4

5 DATED this 16th day of April, 2021.

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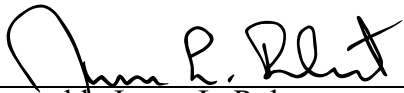
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*Attorneys for Defendant Bagelcode USA, Inc.*

**ORDER**

IT IS SO ORDERED. The Court hereby strikes all deadlines contained in Docket Nos. 30-31, and will reset those deadlines after the Court has ruled on all motions filed by Defendants on or before May 24, 2021 in response to Plaintiff's Complaint.

DATED this 19th day of April, 2021.

  
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Honorable James L. Robart,  
U.S. District Court Judge